



Tropical tuna social risk profile

Forced labor, human trafficking, and hazardous
child labor risks

Ghana, Fishing and Processing

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SEAFOOD SOCIAL RISK TOOL V2

Disclaimer

The Seafood Social Risk Tool has been prepared for information purposes only, and is not intended to constitute business, legal, market, financial or investment advice. The Seafood Social Risk Tool is designed to serve as an informational resource and does not override legislation or internal policies or procedures. It is recommended that all users of the Seafood Social Risk Tool seek independent legal advice. The Monterey Bay Aquarium Foundation shall not be responsible to any party related to its use or interpretation of the information contained in the Seafood Social Risk Tool.

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About the Seafood Social Risk Tool

The Seafood Social Risk Tool profiles seafood production systems around the world and identifies areas within those systems that are at higher risk of containing forced labor, human trafficking, and hazardous child labor to help businesses begin to focus their efforts to improve human rights and labor conditions.

The tool includes more than 80 indicators of risk based on publicly available evidence of forced labor, human trafficking, and hazardous child labor abuses in seafood supply chains as well as an analysis of information about risk factors correlated with these abuses. This information is packaged into risk profiles specified by species and country of origin designed to help businesses better identify the potential for human rights abuses in their supply chains so they can take the first steps toward improving conditions for seafood workers.

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The Seafood Social Risk Tool was created in partnership with the Monterey Bay Aquarium, Sustainable Fisheries Partnership, Liberty Shared, and a team of human rights experts.

Monterey Bay Aquarium's Seafood Watch program raises awareness of important ocean conservation issues and empowers seafood consumers and businesses to make choices for healthy oceans.

Sustainable Fisheries Partnership is a US-registered nonprofit that operates globally to rebuild depleted fish stocks and reduce the environmental and social impacts of fishing and fish farming. The organization works by engaging fishery stakeholders and seafood businesses throughout the supply chain to promote the sustainable production of seafood.

Liberty Shared aims to prevent human trafficking through legal advocacy, technological interventions, and strategic collaborations with NGOs, corporations, and financial institutions globally.

To learn more about Seafood Watch, to view our seafood recommendations, or to view the Seafood Social Risk Tool, [visit SeafoodWatch.org](https://www.seafoodwatch.org).

Overview

This report presents the risk factors for forced labor, human trafficking, and hazardous child labor identified within the Ghanaian tropical tuna fishery and tuna processing within Ghana. Imported tuna to Ghana are not included within the scope of this assessment. For further information, please refer to the profile on tropical tuna in Senegal.

Ghana is a major producer, processor, and exporter of tropical tuna caught in the eastern Atlantic Ocean. Ghana's tuna processing industry is primarily supplied by Ghanaian flagged vessels and to a lesser extent by foreign distant water vessels landing tuna into Ghana, as well as imports from other West African countries including Senegal and Côte d'Ivoire.ⁱ Ghana's marine fleet is composed of four subsectors: small-scale artisanal or canoe, semi-industrial (inshore), industrial (demersal trawl) operations, and industrial (tuna) operations.ⁱⁱ The industrial, deep-sea tuna operations use purse seine and pole-and-line gears. Over 135,000 fishers are directly employed in Ghana's marine capture fisheries, with 2.6 million more people either relying on these fishers as relatives or employed indirectly as office workers and in other supporting roles.ⁱⁱⁱ A 2016 report from the Ministry of Fisheries estimates the total number of fishers at 107,518 though this estimate may only cover the canoe sector.^{iv} Regardless, the seafood industry provides livelihoods for substantial numbers of people.

Base risks of forced labor, human trafficking, and hazardous child labor in the country in general

The base risks of forced labor, human trafficking, and hazardous child labor in Ghana are relatively high. Ghana is a country of origin, transit, and destination for victims of forced labor, human trafficking, and hazardous child labor. While migration patterns in Ghana are dominated by outward migration, Ghana's favorable economic status compared to neighboring countries positions it as a destination for trafficked workers, with adults and children from West Africa trafficked into Ghana for forced labor and sex trafficking.^v The percentage of Ghana's population living below the national poverty line has decreased since the early 2000's but income inequalities, as shown by the Gini Index, have increased over the same period,^{vi} thus, stimulating internal labor movement and labor trafficking.

Legal provisions for workers in the informal sector, which comprise approximately 90-percent of Ghana's workforce, are fewer than in the formal sector and enforcement of labor laws is generally limited.^{vii} Ghana's legal framework and associated penalties for forced labor, human trafficking, and hazardous child labor are insufficient to deter violations. Most notably, child labor laws do not protect children from all forms of hazardous child labor.^{viii} Gaps in the authority of the Ministry of Employment and Labor Relations, poor-interagency coordination, and insufficient resources hinder anti-trafficking and child labor law enforcement.^{ix,x}

Meanwhile, the capacity of workers to defend themselves is hindered by repeated violations of workers' rights to freedom of association and collective bargaining. Although trade unions are active in Ghana, their power is severely limited and so their ability to effectively protect workers is weak. Allegations of corruption and political interference in cases of human trafficking present a serious concern that may further prevent justice for workers.^{xi}

Adjusted risks of forced labor, human trafficking, and hazardous child labor in the country's seafood supply chain

The discourse on forced labor, human trafficking, and hazardous child labor in Ghana's seafood industry is dominated by children's work in fishing on Lake Volta where the primary species caught is tilapia.^{xii,xiii} Moreover, recent evidence points to poor working conditions, instances of forced labor and widespread IUU fishing and Ghana was given a yellow card for, amongst other illegal transshipment at sea between canoes (saiko) and industrial vessels in June 2021.^{xiv}

There is no direct evidence of forced labor or human trafficking in Ghana's tuna fishery and the general structure of the fishery, the absence of international migrant workers, and the absence of agencies used in worker recruitment reduces the risk of these abuses occurring. A significant part of the tuna fishing industry also implements voluntary good labor practices schemes by international companies.

However, a 2020 report by the Environmental Justice Foundation (EJF) connects some tuna vessels to the same beneficial owners (Chinese fishing companies) as vessels in Ghana's industrial trawl fleet, where severe human rights violations including indicators of forced labor are documented. Ghana's Fishery Act, 2002^{xv} prohibits foreign ownership of vessels but this is circumvented using front companies and complex ownership structures.^{xvi} Evidence suggests that an estimated 90-percent of industrial trawlers fishing in Ghanaian waters are beneficially owned by Chinese corporations regardless of the legal prohibitions against this practice.^{xvii} There is currently a full revision of the act underway, which is with Parliament and is expected to be passed in due course.

There have also been claims of illegal, unreported, and unregulated (IUU) fishing in Ghana's tuna fishing industry and there is documented evidence of IUU fishing in the trawl sector.^{xviii} After receiving a warning from the European Commission in 2013 regarding shortcomings in Ghana's system to address IUU fishing, the country subsequently reformed its fisheries governance system, as recognized by the withdrawal of the European Commission's "yellow card" in 2015.^{xix,xx} But the strength of Ghana to fully enforce those reforms is questionable. A recent case serves as an example of the country's failure to adequately implement and enforce penalties for IUU fishing: in August 2020, EJF reported that a Chinese-owned trawler registered in Ghana had been re-licensed to fish by Ghanaian authorities despite having been arrested twice for IUU fishing, first in 2019 when it was issued a fine of US\$1 million but the owners claimed they could not pay, and then again in 2020 after having had its fishing license renewed.^{xxi}

In our opinion it is not possible to determine a uniform level of risk of forced labor, human trafficking, or hazardous child labor in the Ghana tuna fishery. It appears that there might be significant variations between different vessels, possibly depending on their ownership. SSRT therefore recommends rigorous due diligence to individual vessel level when sourcing tuna from Ghana.

Summary of evidence of forced labor, human trafficking, and hazardous child labor in the seafood supply chain

Country-level indicators

- Evidence of forced labor, human trafficking, and hazardous child labor has been found in multiple sectors in Ghana, including agriculture and livestock production, mining, and domestic work.

Seafood industry-level Indicators

- Evidence of forced and hazardous child labor in coastal and inland fishing, particularly in the Lake Volta region.
- Evidence of forced labor and practices indicative of forced labor, e.g., an absence of employment contracts, in the trawl sector.

Fishing indicators

- No evidence was found linking Ghana's tuna fishing industry directly to human trafficking, forced labor, and hazardous child labor. However, evidence from the country's industrial trawl sector indicates possible links to some tuna fishing vessels.

Processing indicators

- No evidence was found linking Ghana's tuna processing industry directly to human trafficking, forced labor, and hazardous child labor.

Summary of factors that affect the likelihood of forced labor, human trafficking, and hazardous child labor in the seafood supply chain

Factors that increase the likelihood

Country-level indicators

- Enforcement of anti-trafficking and child labor laws is hindered by insufficient resources.
- Workers' rights to freedom of association and collective bargaining are repeatedly violated.
- Allegations exist of corruption and political interference in cases of human trafficking.

Seafood industry-level indicators

- Recent evidence of IUU fishing in the industrial fishing sector.
- Ghana has not ratified the ILO C188 Work in Fishing Convention and the country's fisheries regulations are outdated.
- Lack of data around enforcement of workplace regulations on fishing vessels.
- Evidence of Labor Act violations in the trawl sector by not adhering to the written employee contract requirement.
- Evidence of hazardous working conditions in the trawl sector.
- Evidence of bribery and intimidation of fisheries observers onboard trawl vessels.

Fishing indicators

- Some tuna fishing vessels are connected to the same beneficial owners (Chinese fishing companies) that own demersal trawl vessels on which labor violations were documented.

Processing indicators

- There is a lack of published data on the tuna processing sector.

Factors that decrease the likelihood

Country-level indicators

- Laws and regulations are in place to secure human and labor rights.
- Ratification of core ILO conventions is high including forced labor, child labor, and protection of migrant workers.

Seafood industry-level indicators

- Voluntary schemes exist in the Ghanaian tuna supply chain to improve environmental and social sustainability (e.g., fishery improvement projects and social audits).

Fishing indicators

- Migrant labor is not apparent in tuna fishing.
- Recruitment agencies are not used in tuna fishing.
- There is 100-percent fisheries observer coverage and electronic monitoring of the tuna purse seine fleet.

Processing indicators

- Tuna processors are approved to export to the EU and are regularly audited.

Fishing

Most commercial tuna fishing companies are formed as joint ventures between Ghanaian and foreign counterparts (majority South Korean) and with the fishing crew comprising mostly Ghanaian fishermen and South Korean or Chinese captains and officers.^{xxii} Further to this, the large commercial tuna companies also have cold storage, processing, and canning operations in the main Ghanaian port of Tema.^{xxiii}

According to the ICCAT register, there are 37 Ghanaian registered tuna vessels comprising 17 purse seiners and 20 pole-and-line vessels.^{xxiv} The tuna vessels unload approximately every 30 days in Ghanaian ports. The owning companies are registered in Ghana but are generally Korean investments owned by South Korean businesses and operated by South Korean management. The vessels range from 50 meters up to 70 meters for the largest of the purse seiners. Crew numbers vary depending on the needs on board, but the seiners may have around 30 crew while the pole-and-line vessels may have around 50 crew due to the physical nature of tuna capture. Officers are usually South Korean nationals (Captain, Chief, First officers) and crew Ghanaian. There are no international migrant workers other than the South Korean officers, who are highly skilled and who by and large, are naturalized Ghanaians having lived there for decades.^{xxv}

Pole-and-line vessels use live bait to attract tuna, most commonly with sardines and anchovies.^{xxvi} Often the pole-and-line vessels catch their own bait fish with the use of small boats and seines; however, bait may also be purchased from live-bait dealers and other fishers. Bait supply was not the focus of this assessment and so we did not evaluate the details of conditions experienced by sardine and anchovy fishermen.

In November 2013, the European Union presented Ghana with a “yellow card” for non-cooperation against illegal, unreported, and unregulated (IUU) fishing, warning that Ghana’s imports could be banned. This warning was a response to IUU concerns from unreported transshipments of Atlantic tuna by Ghana-flagged vessels^{xxvii} and was later withdrawn due to improvements in October 2015.^{xxviii} The EU is Ghana’s largest market for tuna, so a ban on imports there would seriously threaten the industry. To increase transparency, the Common Oceans ABNJ Tuna Project, which is implemented by the Food and Agriculture Organization of the United Nations, selected Ghana as a pilot for installation of electronic monitoring on tuna vessels. Ghana was chosen due to “its expansive tuna fishing footprint, as well as its need to bring order to observer coverage.”^{xxix} The partnership involves collaboration among WWF, the International Seafood Sustainability Foundation and the Ministry of Fisheries and Aquaculture Development of the Republic of Ghana.

The tuna vessels are largely members of the Ghana Tuna Association (GTA). The association is active in managing the fishery, ensuring compliance of its members, and in representing the sector in conversations with the authority.

Processing and Trade

There are two main tuna canning companies in Ghana – Pioneer Food Cannery (PFC) owned by Thai Union, and Cosmo Seafoods Company owned by Silla. A 2015 study by Asiedu *et al.*, found that there is a total of 6,500 people employed in the Ghana tuna fish chain and a total of 58,000 mt of tuna is canned annually.^{xxx}

Tuna is Ghana's biggest seafood export, contributing significantly to the domestic fisheries sector. For 2018, Ghana reported exports of just under 80,000 MT /\$150 million USD^{xxxii} of seafood, almost entirely tuna. Ghana's main tuna export destination is the European Union, which accounted for 79% of Ghana's seafood export value in 2018.^{xxxiii} Furthermore, Ghana is the largest supplier of tuna to the UK at 23,000 MT /£66 million GBP,^{xxxiii} around half of the total value of all Ghanaian tuna exports.

Due Diligence for Tropical Tuna in Ghana

Important Country-Specific Considerations

- Ghana is a major producer, processor, and exporter of tropical tuna caught in the eastern Atlantic Ocean, with major markets including the European Union and United Kingdom.
- Ghana is a country of origin, transit, and destination for victims of forced labor, human trafficking, and hazardous child labor.
- Legal provisions are limited for informal laborers, who comprise approximately 90 percent of Ghana’s workforce.
- There are significant variations in levels of illegal, unreported, and unregulated fishing depending on individual vessel ownership.

Suggested Due Diligence Priorities & Questions

Worker Demographics

Low-skilled workers, who often also have lower levels of education, are more vulnerable to wage and labor exploitation.

1. What proportion of workers are considered low-skilled in the work environment?
2. What is the proportion of young workers (15-18 years old) in the workforce? What protocols are in place to protect young workers from workplace hazards?

Complaints Mechanisms

Although trade unions are active in Ghana, their power is severely limited and are compounded by allegations of corruption and political interference that may further prevent justice for workers.

1. What are the factors influencing fish workers’ participation, or lack thereof, in trade unions? What are you doing to institutionalize worker organization and collective bargaining in your supply chain?
2. Are there procedures to document, track, and resolve workplace grievances and complaints?

Contracts and Compensation

Little to no information is found on contracts and compensation for tuna fish workers in fishing and fish processing in Ghana.

1. Does the worker have a written contract?
2. Do you know if workers in your supply chain are paid at least the minimum wage?
3. Do you know how the workers are being paid? What payment structure is used to compensate fish workers (e.g. piece rate, fixed monthly salary, catch share)? What is the frequency with which workers are paid? How is the payment transferred to fish workers (e.g. bank transfer, cash, in-kind)? Do fish workers receive advance payments or loans?

Processing Activities

Ghana's tuna processing industry is primarily supplied by Ghanaian flagged vessels, and to a lesser extent, by foreign distant water vessels landing tuna in Ghana, as well as imports from other West African countries, including Senegal and Côte d'Ivoire.

1. Do you know where processing companies are sourcing their tuna inputs? Can tuna inputs be traced back to the vessel and the beneficial vessel owner?

Ghana: Country-level indicators

Indicator	Description	Sources
Poverty levels in a country	<p>Human Development Index</p> <p>HDI Value (2019): 0.611</p> <p>HDI rank (2019): 142</p> <p>Ghana’s HDI value for 2019 is 0.611— which puts the country in the medium human development category— positioning it at 138 out of 189 countries and territories. Between 1990 and 2019, Ghana’s HDI value increased from 0.455 to 0.611, an increase of 31.4 percent.</p>	<p>UNDP Human Development Index (HDI)</p> <p>UNDP Global Human Development Indicators</p> <p>Country Profile: Ghana</p>
	<p>Poverty headcount ratio at national poverty line (% of population): 23.4% (2016).</p> <p>Ghana scores better than neighboring countries Côte d’Ivoire 46.3% (2015), Burkina Faso 40.1% (2014), and Togo 55.1% (2015).</p>	<p>World Bank</p>
	<p>Global Hunger Index</p> <p>GHI (2020): 15.2</p> <p>In the 2020 Global Hunger Index, Ghana ranks 63rd out of 107 qualifying countries. With a score of 15.2, Ghana suffers from a level of hunger that is moderate.</p> <p>Ghana performed better than neighboring countries Côte d’Ivoire (24.5), Burkina Faso (25.8) and Togo (24.1), which all scored within the ‘serious’ level of hunger.</p> <p>Note: GHI is scored on a 100-point GHI Severity Scale, where 0 is the best score (no hunger) and 100 is the worst.</p>	<p>Global Hunger Index (GHI)</p>
Country’s position in the regional	<p>Comparing HDI ranking to other countries in the region</p> <p>Ghana holds the highest UN HDI ranking compared to neighboring countries and others in the region. Further to</p>	<p>UNDP Human Development Index (HDI)</p>

Indicator	Description	Sources
economic power system	<p>this, Ghana scores higher than the average regional rating for Sub-Saharan Africa which is indexed at 0.547 (2019).</p> <p>Ghana</p> <ul style="list-style-type: none"> • HDI Value (2019): 0.611 • HDI rank (2019): 138 <p>Neighboring countries:</p> <p>Côte d’Ivoire HDI Value (2019): 0.538 HDI rank (2019): 162</p> <p>Burkina Faso HDI Value (2019): 0.452 HDI rank (2019): 182</p> <p>Togo HDI Value (2019): 0.515 HDI rank (2019): 167</p> <p>Other countries in region:</p> <p>Niger HDI Value (2019): 0.394 HDI rank (2019): 189</p> <p>Benin HDI Value (2019): 0.545 HDI rank (2019): 158</p> <p>Liberia HDI Value (2019): 0.480 HDI rank (2019): 175</p> <p>Guinea HDI Value (2019): 0.477 HDI rank (2019): 178</p> <p>Mali</p>	

Indicator	Description	Sources
	HDI Value (2019): 0.434 HDI rank (2019): 184	
	<p>Comparing its recent economic growth to the general economic growth rates in the region</p> <p>Ghana holds a similar GDP growth rate to neighboring countries, with each scoring higher than the regional average for Sub-Saharan Africa of 2.3% (2019).</p> <p>Ghana GDP Growth annual +6.5% (2019)</p> <p>Neighboring countries:</p> <p>Togo GDP Growth annual +5.3% (2019)</p> <p>Côte d'Ivoire GDP Growth annual +6.9% (2019)</p>	World Bank Databank figures on annual economic growth
	<p>Migration data</p> <p>Net migration rate (immigrants minus emigrants per 1,000 population) for Ghana is -.03 (2020)</p> <p>Total number of international migrants (2019): 466.8 thousand</p> <p>Migration inflows (2019): No data</p> <p>Net migration rate (2020): -0.3</p>	IOM Migration Data Portal
	<p>Regional migration trends and patterns</p> <p>Ghana has a negative net migration rate, with more Ghanaian's leaving the country for other destinations than citizens of other countries relocating to Ghana. There are incidences of migrant Ghanaian workers being exploited abroad, with allegations of slavery and human trafficking for domestic workers in the Middle East as noted in the US</p>	US Department of State (USDOS) 2021 Trafficking In Persons (TIP) Report

Indicator	Description	Sources
	<p>Trafficking in Persons report, and abuse of fishers on Ireland-flagged vessels reported in 2015 and an on-going court case on human trafficking for forced labor on board a Danish owned vessel involving two Ghanaian fishers.</p>	<p>USDOS Trafficking in Persons (TIP) Report 2020.</p> <p>USDOS Trafficking in Persons (TIP) Report 2019.</p> <p>IOM: SOPs to Combat Human Trafficking in Ghana</p> <p>IOM: Ghana National Migration Policy</p> <p>Migrant Rights Centre Ireland (MRCI), 2017: Left High and Dry – The Exploitation of Migrant Workers in the Irish Fishing Industry</p> <p>Fagbladet 3F, 27 August 2020, Skærpet tiltale: Skibsreder tjente fire millioner på slaver i Thyborøn</p>
	<p>Known human trafficking routes</p> <p>Adults and children from West African countries are exploited in Ghana. Trafficking internally within Ghana also occurs. Ghanaian men, women and children are trafficked to other countries in West Africa, as well as the Middle East and Europe. Ghana is also a transit point for sex trafficking into Europe.</p>	<p>USDOS 2021 Trafficking In Persons (TIP) Report</p>
<p>Governance practices and</p>	<p>WGI (2020) Percentile rank</p> <ul style="list-style-type: none"> • Voice and Accountability: 64.73 	<p>World Governance Indicators (WGI)</p>

Indicator	Description	Sources
<p>systems in a country (measured through indexes)</p>	<ul style="list-style-type: none"> • Political Stability and Absence of Violence: 51.89 • Government Effectiveness: 46.63 • Regulatory Quality: 52.4 • Rule of Law: 53.85 • Control of Corruption: 50.48 <p>Ghana ranks in the mid-percentiles and scores higher than the regional average for Sub-Saharan Africa across all six indicators.</p> <p>Note: Percentile rank among all countries (ranges from 0 (lowest) to 100 (highest) rank)</p>	
	<p>Corruption Perception Index (2019)</p> <p>Score: 41/100</p> <p>Rank: 80/198 countries and territories</p> <p>More than two-thirds of countries score below 50 on this year's CPI, with a global average score of just 43. Ghana's score of 41 places it below the average and positions it 80th out of 198 countries and territories. Ghana shares its position with neighboring Burkina Faso (40), performing better than Côte d'Ivoire (35) and Togo (29).</p> <p>Note: Scores based on 0 = Highly Corrupt, 100 = Very Clean.</p>	<p><u>Transparency International</u> <u>Corruption Perception Index (CPI)</u></p>
	<p>Basel Anti-Money Laundering Index (2020)</p> <p>Rank: 85/141</p> <p>Overall score: 4.89/10</p> <p>Ghana scores in the mid-range of the risk scale for the Basel AML Index. Neighboring country Côte d'Ivoire is scored as a higher risk (score 6.78/10; rank 17). Burkina Faso and Togo are not scored in the Index due to insufficient available information.</p>	<p><u>Basel Anti-Money Laundering (AML) Index</u></p>

Indicator	Description	Sources
	<p>Note: Ranking is out of 141 countries; top possible score is 0 (low risk), lowest score is 10 (high risk).</p>	
	<p>Global Rights Index (2021)</p> <p>Rating: 2 (repeated violations of rights)</p> <p>The ITUC Global Rights Index places Ghana above the regional average ranking of 3.71 for Africa. Neighboring country Burkina Faso was scored at 3, with Côte d'Ivoire given a worse score of 4 (systematic violations of rights) and Togo given the same score of 2.</p> <p>Note: Countries are ranked from 1 to 5+, where five plus corresponds to “no guarantee of rights due to the breakdown of the law” and 1 corresponds to “sporadic violations of rights”.</p>	<p>International Trade Union Conference (ITUC) Global Rights Index (GRI)</p>
<p>Education and general literacy levels in a country</p>	<p>Adult literacy rates, among the population aged 15 years and older (2018): 79%</p> <p>The literacy rate among adults in Ghana is somewhat higher than neighboring Togo (2015: 63.75), and considerably higher than Côte d'Ivoire (2018: 47.2%) and Burkina Faso (2018: 41.2%).</p>	<p>UNESCO Institute for Statistics</p>
	<p>Primary school completion rates, total (% of relevant age group) (2018): 94%</p> <p>The primary school completion rate in Ghana is slightly higher than neighboring Togo, and significantly greater than Burkina Faso and Côte d'Ivoire:</p> <ul style="list-style-type: none"> • Côte d'Ivoire (2019): 79% • Burkina Faso (2019): 65% • Togo (2019): 87% 	<p>World Bank Open Data</p>
	<p>Lower secondary education completion rates (2019): 78.2%</p>	<p>World Bank Open Data</p>

Indicator	Description	Sources
	<p>The lower secondary education completion rate in Ghana is considerably higher than that of neighboring countries Côte d'Ivoire, Burkina Faso, and Togo.</p> <ul style="list-style-type: none"> • Côte d'Ivoire (2019): 52.6% • Burkina Faso (2019): 41.4% • Togo (2019): 50.1% 	
	<p>School enrolment, tertiary (2019): 17% gross</p> <p>The enrolment rate in tertiary education in Ghana is slightly higher than in neighboring countries.</p> <ul style="list-style-type: none"> • Côte d'Ivoire (2017): 9% • Burkina Faso (2019): 7% • Togo (2019): 14% 	<p>World Bank Open Data</p>
<p>Attitudes towards migrant workers in a country's population</p>	<p>Migrant Acceptance Index</p> <p>Gallup created the Migrant Acceptance Index to gauge people's acceptance of migrants based on increasing degrees of personal proximity. The index is based on three questions that Gallup asked in 138 countries in 2016 and the U.S. in 2017. The index is a sum of the points across the three questions, with a maximum possible score of 9.0 (all three are good things) and a minimum possible score of zero (all three are bad things).</p> <p>Migrant Acceptance Index- Ghana: 6.91 (2016)*</p> <p>Ghana receives a similar score to that of Togo, with a lower score than neighboring Burkina Faso and Côte d'Ivoire.</p> <ul style="list-style-type: none"> • Côte d'Ivoire: 7.71 (2016) • Burkina Faso: 7.93 (2019) • Togo: 6.96 (2016) <p>Ghana holds a slightly higher score than the regional average for Sub-Saharan Africa of 6.47 (2016), but there are no migrant fishers at the worker level in the tuna fishery.</p>	<p>Gallup Migrant Acceptance Index</p>

Indicator	Description	Sources
	<p>The Migrant Acceptance Index score for the world is 5.29. Seventy-seven countries score higher than this average, while 61 score lower.</p> <p>Ghana and its neighboring countries are amongst the countries that have a higher Migrant Acceptance Index score than the world score, showing a greater acceptance of migrants than the global average.</p> <p>Note: Based on 138 countries surveyed in 2016; top possible score is 9.0.</p> <p>*Note that the Gallup Migrant Acceptance Index was updated in 2020. However, the publicly accessible 2020 data do not include updates to Ghana’s score.</p>	
Legislation and regulation to protect migrant workers	<p>Coverage of legal provisions under the labor laws</p> <p>The Ghanaian Labor Act (2003) does not distinguish between migrant and non-migrant workers, with the Act applying equally to the workers within its scope. Exemptions are present for sea-going vessels around rights for temporary and casual workers.</p> <p>The Ghana Labor Regulations (2007) includes regulations related to foreign contracts and immigration. Exemption for vessels in Part X ‘Special Provisions Relating to Temporary Workers and Casual Workers’ for ‘sea-going personnel in the fishing industry who are wage earners. This section pertains to remuneration and public holiday allowance for temporary or casual workers. Through being excluded, this is likely to weaken protection for sea-faring workers who do not have strong employment terms / contracts.</p>	<p>Ghana Labour Act, 2003</p> <p>Ghana Labour Regulations, 2007</p>
	<p>Access to social protection, health, and education</p> <p>In September 2000, Ghana ratified the United Nations International Convention on the Protection of the rights of All Migrant Workers and Members of their Families</p>	<p>Government of Ghana Ministry of the Interior: National</p>

Indicator	Description	Sources
	<p>(December 1990, entry into force July 2003). 55 states are party to the convention, which defines the rights of working migrants including non-discrimination, personal freedom, liberty, and participation in unions.</p> <p>Ghana reported on its implementation of the UN International Convention in 2014, with the committee remarking on Ghana’s approach for treating foreigners in Ghana as it would want its own citizens to be treated elsewhere. However, there was also feedback for the Ghanaian Commission regarding the need for the provision of statistics related to measures taken to implement the rights of migrant workers and other requests for further data to be provided by the State.</p>	<p>Migration Policy for Ghana, 2016</p> <p>UN International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families, 1990</p> <p>UN Ratifications of International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families</p> <p>UN Committee on the Protection of the Rights of Migrant Workers and their families considers the report of Ghana, 2014</p> <p>UN Concluding observations on the initial report of Ghana</p>
	<p>Bilateral MOUs or other agreements specifically designed to protect migrant workers</p> <p>Unknown</p>	
Ratification of relevant international	Convention No. 29 - In Force, 20 May 1957.	Forced Labour Convention, 1930 (No. 29)

Indicator	Description	Sources
conventions and domestication of conventions into a national legal framework (Forced labor, human trafficking, and hazardous child labor)		
	Convention No. 105 - In Force, 15 December 1958.	<u>Abolition of Forced Labour Convention, 1957 (No. 105)</u>
	Convention No. 138 - In Force, 6 June 2011.	<u>Minimum Age Convention, 1973 (No. 138)</u>
	Convention No. 182 - In Force, 13 June 2000.	<u>Worst Forms of Child Labour Convention, 1999 (No. 182)</u>
	Protocol 29 - Not Ratified.	<u>Protocol of 2014 to the Forced Labour Convention, 1930 (P29)</u>
	Palermo Protocol - Acceptance, 21 August 2012.	<u>Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (the 'Palermo Protocol')</u>

Indicator	Description	Sources
	Convention No. 188 - Not Ratified.	ILO Convention 188 on Work in Fishing
	PSMA - Party to the PSMA.	The FAO Port State Measures Agreement (PSMA)
	<p>Domestication into national legislation</p> <p>All forms of forced labor are prohibited in Ghana. However, penalties are not consistent with those for other analogous serious crimes.</p> <p>The minimum age for work is set at 15 years, as laid out in Section 89 of the Children’s Act.</p> <p>The minimum age for hazardous work is set at 18 years by Section 91 of the Children’s Act. Hazardous occupations for children are identified in Articles 28.1d, 28.2, and 28.5 of the Constitution; Article 7 of the Labor Regulations Legislative Instrument; Sections 91 to 92 of the Children's Act; and Article 58 of the Labor Act.</p> <p>Trafficking in persons is criminalized in the 2005 Human Trafficking Act (amended 2009), which prescribes penalties of a minimum of five years’ imprisonment. The 2015 regulations for this Act provide guidance on sentencing that allow for the use of a fine in lieu of imprisonment if a parent, guardian, or other person with parental responsibilities facilitates or engages in trafficking.</p>	<p>USDOS, 2021, 2020 Country Reports on Human Rights Practices: Ghana</p> <p>US Department of Labor (USDOL): Ghana – Child Labor and Forced Labor Reports</p> <p>USDOS 2021 Trafficking In Persons (TIP) Report</p>
Regulation of recruitment	<p>Country’s government-sanctioned oversight mechanisms (regulations, accreditation schemes, inspection, etc.) of recruitment agents</p> <p>In Ghana, recruitment agencies are subject to registration, licensing, and regulation. Ghana upholds these standards and has previously implemented temporary bans on</p>	<p>Ghana Labour Act, 2003 (Act 651)</p> <p>Ghana Labour Regulations, 2007 (L. I. 1833)</p> <p>Labour Department – Requirements for</p>

Indicator	Description	Sources
	<p>recruitment of workers from Ghana to Gulf countries in response to allegations of abuse of workers (2017).</p> <p>Labour Act, 2003 (Act 651).</p> <p>Part II – Public Employment Centres and Private ‘Employment Agencies, Section 7 – Private Employment Agencies’.</p> <p>Labour Regulations, 2007 (L.I. 1833)</p> <p>‘3. Private Employment Agency’</p> <p>Ministry of Employment and Labour Relations (MELR)</p> <p>Requirements for Registration of Private Employment Agencies</p> <p>Ministry of Employment and Labour Relations (MELR) - Ghana Labour Market Information System</p> <p>List of agencies: ‘Licensed Local Private Employment Agencies’</p> <p>‘The GLMIS is an active labour market policy instrument that collects, evaluates and provides labour market information to both the labour supply and the labour demand side.’</p>	<p>Registration of Private Employment Agencies</p> <p>Labour Department – Licensed Local Private Employment Agencies</p>
<p>Enforcement of legislation for forced labor, human trafficking, hazardous child labor, migrant worker protections, recruitment and working conditions</p>	<p>TIP Ranking – Ghana (2021): Tier 2</p> <p>‘The Government of Ghana does not fully meet the minimum standards for the elimination of trafficking but is making significant efforts to do so. The government demonstrated overall increasing efforts compared to the previous reporting period; therefore, Ghana remained on Tier 2. These efforts included identifying more potential victims of trafficking and providing comprehensive services for victims in the newly established government shelter for adult female trafficking victims. The government also</p>	<p>USDOS 2021 Trafficking In Persons (TIP) Report</p> <p>USDOS 2020 Trafficking in Persons (TIP) Report.</p> <p>USDOS Trafficking in Persons (TIP) Report 2019.</p>

Indicator	Description	Sources
	<p>investigated and prosecuted more trafficking cases and sentenced more convicted traffickers to significant prison terms; continued to implement standard operating procedures (SOPs) for identification and referral of trafficking victims in some regions; and continued cooperative efforts among police, social welfare, and civil society actors to identify and remove children from trafficking situations. The government also increased its support for implementing Ghana’s anti-trafficking national action plan, training for officials and traditional leaders, and conducting public awareness activities.</p> <p>However, the government did not meet the minimum standards in several key areas. The lack of adequate resources for anti-trafficking law enforcement and social welfare personnel continued to hinder investigations, prosecutions, and protection efforts. The government did not spend funds allocated to the Human Trafficking Fund (HTF) to address the lack of sufficient protection services for adult male and child trafficking victims, and it did not take steps to improve protections for Ghanaian migrant workers before departing and while abroad, particularly in the Gulf. The government did not adequately address corruption, including complicit officials who facilitated trafficking, and it did not amend the anti-trafficking act regulations to remove the option of a fine in lieu of imprisonment in cases where the trafficker is a parent or guardian of the child victim.</p> <p>Ghana has specific legal provisions for the protection of child workers from hazardous labor contained within Part V of The Children’s Act, 2003. The Act proscribes the minimum age for hazardous labor (18 years) and the tasks and conditions for young employment.</p> <p>Ghana has ratified the ILO Forced Labour Convention, 1930 (No. 29). However, the Government has failed to fully report to the ILO against the Convention. The ILO has</p>	

Indicator	Description	Sources
	<p>requested further information on the results of Ghana’s National Action Plan 2013-18 against trafficking in persons, as well as data on the ‘number of investigations, prosecutions, convictions and the penalties imposed with regard to trafficking in persons’ as a result of Ghana’s Human Trafficking Act.</p> <p>Ghana is categorized as Tier 2 on the US TIP report. The report remarks on both domestic and foreign (particularly Nigerian) trafficking victims within Ghana, who are exploited for forced labor and sex trafficking. Additionally, Ghanaian victims are trafficked abroad to the Middle East, other West African countries, and Europe for labor and sexual exploitation.</p> <p>The US TIP report raises the significant efforts made by Ghana over recent years to eliminate trafficking, which includes new Standard Operating Procedures to Combat Human Trafficking in Ghana, created through bilateral agreements between the United States and Ghana.</p> <p>In 2016, Ghana implemented new national migration policy to manage ‘internal, intra-regional and international migration flows. Its aim is to promote the benefits and minimize the costs of migration.’</p> <ul style="list-style-type: none"> • Côte d’Ivoire: Tier 2 (2020) • Burkina Faso: Tier 2 (2020) • Togo: Tier 2 (2020) (In 2018, Togo was listed on the Tier 2 Watch List) 	
	<p>According to the US Department of Labor, Ghana made only “moderate advancement” in its efforts to eliminate the worst forms of child labor in 2020. Among other issues such as inadequate legislation, resource constraints limited the government’s ability to enforce child labor laws during the reporting period. These limitations included an insufficient number of labor inspectors for Ghana’s workforce (62 in 2020, compared to the recommended 833</p>	<p>US Department of Labor (USDOL): Ghana – Child Labor and Forced Labor Reports</p>

Indicator	Description	Sources
	<p>inspectors based upon ILO technical advice) and inadequate funding for the labor inspectorate. In addition, law enforcement is hampered by poor inter-agency coordination and insufficient resources, high staff turnover, and an insufficient number of state attorneys to prosecute child trafficking crimes.</p>	
	<p>Global Slavery Index (2018)</p> <p>Estimated number of people living in modern slavery: 133,000</p> <p>Prevalence Index Rank: 71/167</p> <p>Vulnerability to Modern Slavery: 52.16/100</p> <p>Government Response Rating: CC</p> <p>CC Rating Description: The government has a limited response to modern slavery, with largely basic victim support services, a limited criminal justice framework, limited coordination or collaboration mechanism, and few protections for those vulnerable to modern slavery. There may be evidence that some government policies and practices facilitate slavery. Services are largely provided by IOs/NGOs with limited government funding or in-kind support.</p> <p>Ghana scores better than the average vulnerability score for Africa at 62/100. Ghana holds the same rating for government response as the African average scored at 'CC'.</p> <p>Note: The GSI ranks government responses from AAA (very comprehensive response) to D (very inadequate), and a higher rating on the GSI is assumed to mean lower risk by the SSRT.</p>	<p>Global Slavery Index (GSI)'s overall ratings</p> <p>Global Slavery Index 2018 Country Data for Ghana</p> <p>Global Slavery Index Rating Description</p>

Indicator	Description	Sources
	<p>Documentation from national labor inspection and other law enforcement agencies</p> <p>The US Department of Labor has profiled Ghana’s various institutional mechanisms in place related to forced labor, human trafficking, and child labor at the legislative, policing and community levels, although gaps remain across these.</p> <p>Legislation: Human Trafficking Act, 2005 (Act 694)</p> <p>Enforcement: Ghana Police Service - Anti Human Trafficking Unit, whose website remarks on several convictions throughout 2018.</p> <p>Legislation: Prohibition of Forced Labor: Articles 16.1 and 16.2 of the Constitution; Articles 116 and 117 of the Labor Act; Sections 1–3 and 42 of the Human Trafficking Act; Sections 1 and 2 of the Human Trafficking Prohibition Legislative Instrument (39; 49; 51; 52).</p> <p>Enforcement: Ministry of Employment and Labor Relations – District Assemblies employ labor inspectors to investigate child labor violations, educate employers, and conduct inspections.</p> <p>Ghana Police Service – Domestic Violence and Victim Support Unit.</p> <p>Ghana has signed the Blue Justice Ministers’ Declaration on ‘Transnational Organized Crime in the Global Fishing Industry’. The non-legally binding declaration recognizes the ‘inter-continental flow of illegal fish products, illicit money and human trafficking victims in transnational organized crime cases in the global fishing industry’.</p>	<p>USDOL: Child Labor and Forced Labor Reports – Ghana</p> <p>Anti Human Trafficking Unit</p> <p>Ministers’ Declaration</p>
	<p>Ghana has ratified the ILO Forced Labour Convention, 1930 (No. 29). However, the Government has failed to fully report to the ILO against the Convention. The ILO has requested further information on the results of Ghana’s National Action Plan 2013-18 against trafficking in persons,</p>	<p>ILO – Direct Request to Ghana, 2018</p>

Indicator	Description	Sources
	<p>as well as data on the ‘number of investigations, prosecutions, convictions and the penalties imposed with regard to trafficking in persons’ as a result of Ghana’s Human Trafficking Act.</p> <p>Ghana has signed the ‘Ministers’ Declaration on Transnational Organized Crime in the Global Fishing Industry’. The non-legally binding declaration recognizes the ‘inter-continental flow of illegal fish products, illicit money and human trafficking victims in transnational organized crime cases in the global fishing industry’.</p>	
<p>Evidence of forced labor, human trafficking, and hazardous child labor in the country</p>	<p>The Global Slavery Index identifies forced labor of adults and children within the Ghanaian cocoa industry, estimating 3.3/1000 adult workers to be victims of forced labor and 1.5/1000 child workers to be victims of child forced labor (at the hands of a person outside of the family) in the period August 2016 – August 2017.</p> <p>Ghana has been recognized by the US Department of Labor as engaging in hazardous child labor within the following sectors:</p> <p>Agriculture</p> <ul style="list-style-type: none"> • Cocoa, palm oil and cotton production. • Herding livestock, hunting and work within slaughterhouses. • Fishing, gear preparation, fish processing. <p>Industrial</p> <ul style="list-style-type: none"> • Quarrying and mining, including gold. • Manufacturing and sawmills. • Construction and brick laying. <p>Services</p> <ul style="list-style-type: none"> • Domestic work. • Work in transportation. • Electronic waste and garbage scavenging. 	<p>GSI: Importing Risk - Cocoa</p> <p>USDOL: Child Labor and Forced Labor Reports – Ghana</p> <p>UNICEF: Republic of Ghana, National Action Plan Phase II</p>

Indicator	Description	Sources
	<ul style="list-style-type: none"> • Street work, such as begging, vending and work in restaurants or bars. <p>Forced labor of children is characteristic of several of the above categories and with human trafficking also linked to forced labor of adults and children in these sectors. In addition to the above categories are commercial sexual exploitation of children and forced ritual servitude.</p> <p>UNICEF estimates that 14.2% of children in Ghana are engaged in the worst forms of child labor (source data 2014).</p>	

Table 1: Ghana - Country-level indicators

Ghana: Seafood industry-level indicators

Indicator	Description	Sources
<p>Direct evidence of Forced labor, human trafficking, and hazardous child labor</p>	<p>The US Department of Labor’s 2020 List of Goods Produced by Child Labor or Forced Labor identifies ‘fish’ and ‘tilapia’ in Ghana as products of child labor and forced labor. Children are often trafficked to undertake this work.</p> <p>Fishing activities that the US Department of Labor’s Worst Forms of Child Labor Report identifies as being undertaken by child labor in the Ghanaian seafood industry are ‘fishing, including for tilapia; preparing bait, nets, and fishing gear; launching, paddling, and draining canoes; diving for fish; casting and pulling fishing nets and untangling them underwater; sorting, picking, cleaning, smoking, transporting, and selling fish; cleaning and repairing nets; and building and repairing boats.’</p> <p>During the 2020 Reporting period, Ghana had made some advancements towards eliminating hazardous child labor in their workforce. They opened a shelter for victims and began setting up a structure for future efforts. However, enforcing these regulations to prosecute child labor and child trafficking in Ghana is still very underfunded and unregulated. USDOL, 2020</p> <p>Human trafficking and forced child labor are prevalent in the Lake Volta fishing industry where children as young as five years old engage in hazardous work, according to the 2020 Trafficking in Persons report. The report also links forced child labor to coastal fishing.</p> <p>A 2020 report by the Environmental Justice Foundation (EJF) also found evidence of forced labor and indicators of forced labor on board industrial trawl vessels flagged and fishing in Ghana and crewed by Ghanaian fishers. Those vessels are licensed to fish for demersal species such as squid, octopus, cuttlefish, groupers, and snappers. While the vessels are nominally owned and registered in Ghana,</p>	<p>USDOL, 2020 List of Goods Produced by Child Labor or Forced Labor</p> <p>USDOL: Child Labor and Forced Labor Reports – Ghana</p> <p>USDOS, 2019 Trafficking in Persons (TIP) Report</p> <p>USDOS, 2020 Trafficking in Persons Report - Ghana</p> <p>USDOS, 2021 Trafficking in Persons Report - Ghana</p> <p>EJF, 2020, Fear, Hunger and violence. Human rights in Ghana’s industrial trawl fleet</p>

Indicator	Description	Sources
	<p>the beneficial ownership rests with Chinese fishing companies and captains are usually Chinese. The report documents severe violence and intimidation, long working hours, and hazardous living and working conditions.</p>	
<p>ILO indicators of forced labor and ILO R190 definition of hazardous child labor</p>	<p>There are significant indications that children perform hazardous work in the seafood industry in Ghana, notably on Lake Volta, where children fish from dug-out canoes and perform dangerous activities such as diving into the waters to untangle fishing nets. However, according to the US Department of State, working underwater is not legally recognized in Ghana as hazardous work.</p> <p>There are also indications of forced labor in the trawl industry fishing, for instance, for snapper. EJF (2020) documents an absence of worker contracts, high levels of violence and intimidation, and hazardous working conditions, all of which may indicate forced labor.</p>	<p>USDOS, 2019, 2019 Country Reports on Human Rights Practices: Ghana</p> <p>ILO – Direct Request to Ghana, 2018</p> <p>Ghana: The Children’s Act, 2003</p> <p>IJM Child Trafficking into Forced Labor on Lake Volta, Ghana</p> <p>African Journal of Marine Science: Socioeconomic dynamics of the Ghanaian tuna industry: a value-chain approach to understanding aspects of global fisheries</p> <p>EJF, 2020, Fear, Hunger and violence. Human rights in Ghana’s industrial trawl fleet</p>

Indicator	Description	Sources
<p>Fishing, aquaculture and processing regulations and policies</p>	<p>Labor-related fishing legislation</p> <ul style="list-style-type: none"> • Ghana Fisheries Act 2002 • Fisheries Amendment Act 2014 • Fisheries Regulations 2015 • Fisheries Management Plan of Ghana 2015-2019. <p>In October 2015, the EU lifted their yellow card on Ghana, stating that Ghana has successfully addressed the shortcomings in their fisheries governance system since receiving warnings from the Commission in November 2013 and June 2014. They have amended their legal frameworks to combat IUU fishing, strengthened their sanctioning systems, improved monitoring, and control of their fleets to comply with international law.</p> <p>As part of the reforms, the Fisheries Enforcement Unit implemented electronic monitoring to all Ghanaian industrial vessels and land and sea patrols, leading to the arrest and prosecution of fisheries offenders.</p> <p>However, there are some concerns that there is IUU taking place in the trawling sector (not tuna) and that the management plan is not being effectively implemented. In August 2020, EJF reported that a Chinese-owned trawler registered in Ghana had been re-licensed to fish by Ghanaian authorities despite having been arrested twice for IUU fishing, first in 2019 when it was issued a fine of US\$1 million but the owners claimed they could not pay, and then again in 2020 after having had its fishing license renewed.</p> <p>In 2016, Ghana ratified the IUU Port State Measures.</p> <p>Collaborative fishing was the big issue around IUU relating to Ghana’s tuna fishery. This is when a purse seiner and pole-and-line vessel work together to catch tuna and it was deemed as IUU by the EU. Essentially the purse seiner will capture the fish in its net and brail into a chute that loads it into the pole-and-line fishing vessel. The pole-and-line</p>	<p>Ghana Fisheries Act, 2002.</p> <p>Fisheries Amendment Act 2014.</p> <p>Fisheries (Amendment) Regulations 2015.</p> <p>Fisheries Management Plan of Ghana 2015-2019.</p> <p>Ghana's Ratification of the Port State Measures Agreement.</p> <p>EJF, 24 August 2020, 'Chinese'-owned trawler in Ghana re-licensed despite illegal fishing and unpaid fine'</p>

Indicator	Description	Sources
	<p>vessel would then land the fish in port acting as a carrier. It should be noted that this type of fishing was considered legal by the Ghana authority at the time and was being declared. However, due to market pressures the authority outlawed collaborative fishing and there is no evidence that it takes place anymore. This is also confirmed by unpublished research found by SSRT researchers.</p>	
<p>Enforcement and implementation of industry-specific regulations and policies</p>	<p>There is electronic monitoring of all purse seine trips whereby camera footage is recorded and reviewed when the vessel has returned to port. The intention is also to apply electronic monitoring to the pole-and-line vessels, but this is not yet in place. It should also be noted that a report by EJF, 2020 found severe instances of violence and intimidation on board trawl vessels (not tuna fishing vessels) despite observer coverage.</p> <p>The Common Oceans ABNJ Tuna Project was initiated in October 2015, and in January 2019 celebrated the achievements of their electronic monitoring pilot with the equipment now transferred to the Ghanaian authorities.</p> <p>Partners of the project included the Government of Ghana, World Wildlife Fund (WWF), International Seafood Sustainability Foundation (ISSF) and the Ghana Tuna Association (GTA). The project sought to use Electronic Monitoring Systems (EMS) to observe vessel operations for compliance assurance, with land-based observers reviewing the footage. With 154 trips reviewed, the project’s EMS implementation was considered to have offered ‘significant benefits to the Ghanaian tuna purse seine fisheries sector’, contributing to transparency and verifiable compliance data in the fight against IUU. As of August 2019, it is understood that the EMS program does not directly monitor working conditions onboard. However, it is collecting data relevant to working conditions and it is something that could be monitored if the right procedures were in place. There is likely to be an indirect benefit for</p>	<p>FAO: Tuna Biodiversity</p> <p>FAO</p> <p>WorldWildlifeFund</p> <p>MOFAD</p> <p>EJF, 2020, Fear, Hunger and violence. Human rights in Ghana’s industrial trawl fleet</p>

Indicator	Description	Sources
	<p>labor conditions since any abuse within view of the cameras would be recorded and could be used for prosecution if allegations were made. This threat and increased transparency should help to lower risks in the fishery.</p>	
<p>Access to workplaces for third-party monitors (trade union representatives, on-board observers, etc.)</p>	<p>There is no public indication of labor inspections of fishing vessels by the Ghana Ministry of Employment or other authority. However, unions are present and active in the tuna fishing industry, such as the National Union of Seamen and the Maritime and Dockworkers' Union (who is also an affiliate of ITF). Collective bargaining agreements are common in the Ghana tuna fishing industry.</p> <p>However, workers would say if asked that they are not satisfied with the effectiveness of trade unions in protecting their rights.</p> <p>The Ghanaian fisheries authorities systematically deploy fisheries observers onto all tuna fishing vessel trips to monitor fishing activities. Furthermore, there is electronic monitoring in place onboard all purse seine tuna vessels, installed as part of the FAO partnership for sustainability in the ABNJ. This recording of video footage is constant onboard and reviewed by the fisheries department once the vessel returns to port. The pole-and-line tuna vessels do not yet have the electronic monitoring equipment installed but the intention is to have it installed on all vessels.^{xxxiv}</p> <p>Despite the extensive observer coverage, EJF (2020) has documented significant continued IUU fishing and human rights violations on board trawlers. This is linked to both bribery and intimidation of fisheries observers by vessel captains (usually Chinese nationals).</p>	<p>National Union of Seamen (NUS)</p> <p>Maritime and Dockworkers' Union (MDU)</p> <p>2018 ITUC Global Rights Index</p> <p>ITUC, CSI and IGB – Survey of violations of Trade Union Rights</p> <p>Action plan for the preparation of an Eastern Atlantic – Ghana based – pole-and-line tuna Fishery Improvement Project (FIP), 2018</p> <p>FAO, 2019</p> <p>EJF, 2020, Fear, Hunger and violence. Human rights in Ghana's industrial trawl fleet</p>
<p>Worker access to a functional</p>	<p>None found.</p>	

Indicator	Description	Sources
grievance mechanism		
Access to join a trade union	<p>The Ghanaian constitution protects the right of workers to join or form a union. Available trade unions for fishermen include National Union of Seamen and the Maritime and Dockworkers' Union (also an affiliate of ITF). The ITUC scored Ghana with a rating of 3 - 'regular violations of rights'. Whilst Union membership is legally permitted in Ghana, there are barriers to initiating worker organization and reports of anti-union and retaliatory action by private companies persist though no available data specific to the fishing industry was found.</p>	<p>Constitution of the Republic of Ghana</p> <p>ITUC, CSI and IGB – Survey of violations of Trade Union Rights</p>
Participation in voluntary schemes and implementation of comprehensive corporate policies and strategies to combat forced labor, human trafficking, and hazardous child labor	<p>Two Fishery Improvement Projects (FIPs) are active in Ghana encompassing the tuna vessels - the Ghana tuna Pole-and-line FIP and Eastern Atlantic Purse Seine FIP. They are comprehensive FIPs initiated in 2018 with a target end date of December 2023. Regular information on the fisheries and progress reports are provided on the www.fisheryprogress.org website.</p> <p>In 2017, Thai Union announced its Vessel Improvement Program and Vessel Code of Conduct, which offers guidance to its suppliers who must commit to improving labor conditions. In 2018, Thai Union began to assess suppliers' fishing vessels against the Code of Conduct, conducting assessments on-board vessels which include crew interviews. A Ghana-based Thai Union supplier is Pioneer Foods Cannery Ltd (PFC).</p>	<p>Ghana Tuna Pole & Line FIP</p> <p>Eastern Atlantic Purse Seine FIP</p> <p>Thai Union Sustainability Report</p> <p>Ghana – Pioneer Food Cannery</p> <p>Common Oceans EM Project</p> <p>Ministers' Declaration</p>

Table 2: Ghana - Seafood industry-level indicators

Ghana: Fishing indicators

Indicator	Description	Sources
Direct evidence of Forced labor, human trafficking, and hazardous child labor	There is no direct evidence of forced labor, human trafficking, or hazardous child labor in Ghana’s tuna fishing industry. It should be noted, however, that the beneficial owners (Chinese fishing companies) of trawl vessels, on board which forced labor is documented, also own tuna fishing vessels according to EJF.	EJF, 2020, Fear, Hunger and violence. Human rights in Ghana’s industrial trawl fleet
ILO indicators of forced labor and ILO R190 definition of hazardous child labor	<p>Ghana has specific legal provisions for the protection of child workers from hazardous labor contained within Part V of The Children’s Act, 2003. The Act proscribes the minimum age for hazardous labor (18 years) and the tasks and conditions for young employment.</p> <p>Allegations of exploitation of child labor in Ghana’s seafood industry focus on Lake Volta and are not connected to tuna capture.</p> <p>There are no public allegations linking the Ghanaian tuna industry to forced labor or child labor. With tuna vessels being crewed by domestic fishermen and trip times of only around 30 days leading to frequent returns to Ghanaian ports, this protects crew from many of the conditions of forced labor. However, beneficial ownership may link some tuna vessels to companies that also operate trawl vessel on board which forced labor was document by EJF.</p>	<p>Ghana: The Children’s Act, 2003</p> <p>IJM Child Trafficking into Forced Labor on Lake Volta, Ghana</p> <p>African Journal of Marine Science: Socioeconomic dynamics of the Ghanaian tuna industry: a value-chain approach to understanding aspects of global fisheries</p> <p>EJF, 2020, Fear, Hunger and violence. Human rights in Ghana’s industrial trawl fleet</p>
Fishing Characteristics	<p>Thirty or more days at sea</p> <p>A 2018 study on the Ghanaian tuna industry states that Ghana’s tuna vessels spend on average 30 to 45 days at sea. The length of trips varies by how good the catch is, weather and season.</p>	African Journal of Marine Science: Socioeconomic dynamics of the Ghanaian tuna industry: a value-chain approach to

Indicator	Description	Sources
		understanding aspects of global fisheries
	<p>Targeting overexploited stocks</p> <p>Atlantic skipjack tuna stocks are in decent condition right now and have been since 2011. The Pole-and-line fleet catch almost exclusively skipjack tuna but there is interaction with more species by the purse seine vessels. The bigeye abundance in the Atlantic is of concern, with overfishing and a lack of control.</p> <p>Skipjack tuna caught in the Atlantic Ocean by floating object (FAD) purse seine gear is rated as ‘Avoid’ by Seafood Watch, mainly due to the risk of impacts on other species and the failure of management to address overfishing of bigeye tuna.</p> <p>FishSource scores for the East Atlantic skipjack fishery targeted by Ghana indicates that the stock is in good health and the fishery is reasonably managed although there is room for improvement.</p>	Seafood Watch - Tuna Recommendations FishSource - Skipjack tuna, Eastern Atlantic Ocean
Evidence of correlated practices	<p>IUU fishing</p> <p>The tuna vessels included in the scope of this report are all flagged to Ghana. At-sea transshipment is prohibited by the Ghanaian fishery authority and this is noted on the vessel fishing licenses. Fishing vessels are AIS-registered. Ghana’s Fisheries and Aquaculture Development Ministry has made public statements regarding their efforts to combat IUU fishing.</p> <p>In 2013, Ghana received a ‘yellow card’ from the EU for failure to combat IUU fishing. This was lifted in 2015 following ‘constructive cooperation’ with significant efforts from the Ghanaian Ministry. Ghana received another yellow card, notably for the illegal at-sea transshipment</p>	FAO: Global Study on Transshipment ICCAT Vessel Register IUU Watch - Saiko EJF, 2020, Europe – a market for illegal seafood from West Africa: The case of Ghana’s industrial trawl sector Ghana Combats IUU

Indicator	Description	Sources
	<p>between small scale canoes (saiko) and industrial vessels in June 2021.</p> <p>Whilst IUU fishing from foreign and domestic vessels is reported in Ghana’s waters, these allegations focus on other species and gear types, such as industrial trawlers and sardinella caught within the traditional practice of ‘saiko’.</p> <p>Two trawl vessels with confirmed cases of IUU fishing in that sector also beneficially operate two tuna vessels authorized to export fisheries products to the EU, although there is no known evidence of infractions on these tuna vessels.</p> <p>There is an ongoing investigation of IUU fishing in the tuna industry by the UK’s Crown Prosecution Service (CPS) although the industry denies these allegations and no prosecutions have been made to date.</p> <p>Collaborative fishing was another concern within the Ghanaian pole-and-line and purse seine tuna industries. It consists of a purse seiner and pole-and-line vessel working together to catch tuna and was deemed as IUU by European Union member state authorities and buyers.</p> <p>Further evidence of IUU fishing in the Ghana fishery sector (not specific to tuna) is reported due to weaknesses in sanctions imposed on trawlers found to be fishing illegally. A report by China Dialogue Ocean cited the weak penalties imposed by the Ghana authorities for committing fishery offences as allowing IUU to take place.</p>	<p>Ghana AIS Data</p> <p>Ghana IUU Yellow Card</p> <p>Ghana IUU Yellow Card Lifted</p> <p>Europa</p> <p>UK CPS Case</p> <p>China Dialogue Ocean</p>
	<p>Transshipment</p> <p>At-sea transshipment is prohibited by the Ghanaian fisheries authority (FAO).</p>	<p>FAO: Global Study on Transshipment</p>
	<p>Suspect or illegal flagging practices</p>	

Indicator	Description	Sources
	Unknown	
	<p>AIS dark spots to conceal criminal activities</p> <p>Unknown</p>	
Workforce Characteristics	<p>The proportion of fishers that are migrant workers</p> <p>Fishing crew on tuna vessels are solely Ghanaian nationals. Occasionally Ghanaians also act as second officers or second engineers, but the roles of captains and most officers are held by migrant South Korean or Chinese nationals, with most tuna fishing companies in Ghana being joint ventures between Ghanaian and South Korean or Chinese companies. It is a requirement of the Ghanaian government that at least 75% of crew are Ghanaian.</p> <p>There are no public allegations available of mistreatment of the South Korean or Chinese workers.</p>	<p>African Journal of Marine Science</p> <p>Ghana – Joint Ventureship on Tuna Fishing</p>
	<p>A high proportion of fishers from ethnic minority and other marginalized groups</p> <p>Fishing crew on tuna vessels are solely Ghanaian nationals, but sometimes Ghanaians also act as second officers or second engineers. The roles of captains and most officers were held by migrant South Korean or Chinese nationals, with most tuna fishing companies in Ghana being joint ventures between Ghanaian and South Korean or Chinese companies. It is a requirement of the Ghanaian government that at least 75% of crew are Ghanaian.</p> <p>However, public information is not available showing further demographic or regional break-down of tuna fishermen to identify other areas of potential marginalization.</p>	<p>African Journal of Marine Science</p>
Recruitment and Contracts	Use of recruitment agents	<p>Ghana Labour Act, 2003 (Act 651)</p>

Indicator	Description	Sources
	<p>There is no publicly available information regarding the use of recruitment agencies within the tuna industry in Ghana. One paper cited direct employment, with fishermen congregating in certain locations in ports such as Tema from which fishing companies can bring them for interview.</p> <p>However, regarding the fishing sector it is evident from privately held conversations during vessel monitoring made available to SSRT by credible source (as of October 2019) with fishermen that they are employed directly by the fishing companies, recruitment agents are not used. It is common for fishermen to find the jobs via friends or family relating to existing fishermen.</p> <p>Additionally, in Ghana recruitment agencies are subject to registration, licensing, and regulation.</p> <p>Labour Act, 2003 (Act 651).</p> <p>Part II – Public Employment Centres and Private ‘Employment Agencies, Section 7 – Private Employment Agencies’.</p> <p>Labour Regulations, 2007 (L.I. 1833)</p> <p>‘3. Private Employment Agency’</p> <p>Ministry of Employment and Labour Relations (MELR)</p> <p>Requirements for Registration of Private Employment Agencies</p> <p>Ministry of Employment and Labor Relations (MELR) - Ghana Labor Market Information System</p> <p>List of agencies: ‘Licensed Local Private Employment Agencies’</p>	<p>Value Chain Analysis of Tuna Industry in Ghana</p> <p>Ghana Labour Regulations, 2007 (L. I. 1833)</p> <p>Labour Department – Requirements for Registration of Private Employment Agencies</p>

Indicator	Description	Sources
	<p>'The GLMIS is an active labor market policy instrument that collects, evaluates and provides labor market information to both the labor supply and the labor demand side.'</p>	
	<p>Contract-and compensation- related regulations and practices</p> <p>There is no publicly available information about the use and content of employment contracts for fishermen within the Ghanaian tuna industry.</p> <p>Ghana's Labor Act requires written contracts of employment for workers employed for 6 months or more within a year. Exclusions exist for casual or temporary workers, who may not need a written contract but have minimum standards that must be met in practice. Additionally, pay is covered in the Labor Act regarding legal tender and allowable deductions.</p>	<p>Labour Department – Licensed Local Private Employment Agencies</p>

Table 3: Ghana - Fishing indicators

Ghana: Processing indicators

Indicator	Description	Sources
Direct evidence of forced labor, human trafficking, and hazardous child labor	None found.	
ILO indicators of forced labor and ILO R190 definition of hazardous child labor	Evidence of exploitation of child labor in Ghana's seafood industry are only levelled at Lake Volta. Whilst there are statements of child labor within seafood processing in Lake Volta (for example, the smoking of freshwater fish caught in the lake), there are no public allegations linking the Ghanaian tuna processing industry to forced labor or child labor. Fish from Lake Volta is harvested and processed for local consumption and not for export, a major difference from the tuna industry, which is all produced for export.	Ghana: The Children's Act, 2003 IJM Child Trafficking into Forced Labor on Lake Volta, Ghana MOFAD – Strategy on Anti-Child Labour and Trafficking in Fisheries US Department of Labor – Child Labor and Forced Labor Report: Ghana
Processing Characteristics	<p>Processing stage</p> <p>Processing of tuna in Ghana is primarily canning.</p>	Research: Performance of Processing Sector – Ghana
	<p>Consolidation and vertical integration</p> <p>The main processing companies are part of large, multinational corporations who either have ownership or contractual relationships with the tuna vessels/fishing company. There are regular audits of the facilities by European buyers and the facilities are approved to export to the EU.</p>	Value Chain Analysis of Tuna Industry in Ghana
	Domestic versus export	FAO Profile: Ghana

	Processed tuna is primarily destined for the EU market, but it is also exported to the US and neighboring countries with a minority amount sold within the domestic market.	
Workforce Characteristics	<p>Skilled versus low-skilled</p> <p>A basic level of education is required to work within a processing plant to be able to read signs and notices, and to sign records. There is no further publicly available information on the skill-level of workers within the Ghanaian tuna processing sector.</p>	Research: Performance of Processing Sector – Ghana
	<p>The proportion of women in the workforce</p> <p>The general picture appears to be that women comprise a significant proportion of the Ghanaian tuna processing sector, with a 2015 study stating that 80% of the workforce were women, although this may fluctuate.</p>	Value Chain Analysis of Tuna Industry in Ghana
	<p>The proportion of migrant versus local workers</p> <p>The processing factories are sited in Tema and Accra, near the ports where the tuna is unloaded, and workers are primarily Ghanaian.</p>	FAO Profile: Ghana
	<p>The proportion of minority or indigenous workers</p> <p>There is no publicly available information on whether ethnocentric discrimination is prevalent within the Ghanaian tuna processing sector.</p>	FAO Profile: Ghana
	<p>The proportion of temporary and contract versus permanent workers</p> <p>There is a general lack of data around workforce characteristics in the tuna processing sector.</p>	
	<p>Workers' origins</p> <p>There is a general lack of data around workforce characteristics in the tuna processing sector.</p>	

	<p>Migrant worker language (vs. dominant language in the industry)</p> <p>There is a general lack of data around workforce characteristics in the tuna processing sector.</p>	
	<p>GDP per capita of processing country and main worker source country</p> <p>There is a general lack of data around workforce characteristics in the tuna processing sector.</p>	
	<p>Legal presence (regularity) of migrant workers</p> <p>There is a general lack of data around workforce characteristics in the tuna processing sector.</p>	
	<p>The ability of migrant workers to change jobs</p> <p>There is a general lack of data around workforce characteristics in the tuna processing sector.</p>	
Recruitment and Contracts	<p>Use of contractors and recruitment agents</p> <p>Unknown</p>	
	<p>Compensation method</p> <p>Unknown</p>	

Table 4: Ghana - Processing indicators

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